

JAG:BCS/NHM  
F.#2010R01470

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

JOO AHN KANG and  
CHUNG SIK KWAK,

DISCLOSURE STATEMENT BY THE  
UNITED STATES CONCERNING  
ORGANIZATIONAL VICTIMS

10-CR-660 (JG)

Defendants.

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Pursuant to Federal Rule of Criminal Procedure 12.4(a)(2), the United States of America, through its attorneys, includes in the attachment to this Statement a partial list of organizational victims in the above-captioned case. The government understands that there are some 1,000 or more additional organizational victims that are Korean ethnic travel agents that were located in New York, San Francisco, Los Angeles, Chicago, and Seattle during the period January 2000 through February 2006, and that purchased tickets from Asiana Airlines, Inc. ("Asiana"). Asiana has approximately 3,000 travel agent customers, over 1,000 of which are Korean ethnic travel agents. Although it may be possible to identify all 3,000 or so travel agents to which Asiana sold tickets during the time frame covered by the Indictment, there is no way readily to identify those travel agencies that purchased the tickets that were the subject

of the conspiracy alleged in the Indictment. However, the United States understands that those additional organizational victims are predominantly sole proprietorships and family-owned businesses that sold largely to the Korean communities within the five cities identified above.

Dated: September 13, 2010  
Brooklyn, New York

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